



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Sharon Sprayregen
phone: 212-356-0873
fax: 212-356-2088
email: ssprayre@law.nyc.gov
(not for service)

March 13, 2020

BY ECF

Honorable Katherine Failla
United States District Judge
United States District Court
40 Foley Square
New York, NY 10007

Re: *Staboleski v. The City of New York*,
19 CV 8834 (KPF)

Dear Judge Failla:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel assigned to represent Defendant in the above-referenced matter, in which *pro se* Plaintiff alleges that an officer who arrested him and the lieutenant on duty violated his First Amendment rights by denying him access to his Quran and prayer rug.

I am writing to respectfully request a four week adjournment, from March 16, 2020 to April 13, 2020 for Defendant to respond to the Complaint, and a corresponding four week adjournment from March 16, 2020 to April 13, 2020 (or a date thereafter that is convenient for the Court) of the initial pretrial conference. I apologize for the timing of this request. Though Plaintiff has provided a telephone number in dkt. no. 10, I have been unable to reach Plaintiff at that number (there is an automatic recording, and I have left two messages). The requested enlargement of time would permit Defendant to write to Plaintiff and confer about the issues. Additional time is also required to conduct the necessary legal and factual investigation of Plaintiff's claims to prepare an appropriate response to the Complaint.

I also write to inform the Court that an attorney whose office is on my floor at the Office of the Corporation Counsel has tested positive for COVID-19; therefore, I am subject to the Southern District's Standing Order, and am not permitted to enter the courthouse. Should the Court deny Defendant's request to adjourn the conference, I write to request guidance on how to proceed.

This is Defendant's first request for an extension. As discussed above, I have not been able to reach Plaintiff to obtain his consent to this request. Thank you for your consideration of this request.

Respectfully submitted,

/s/

Sharon Sprayregen
Assistant Corporation Counsel

CC: *via regular mail*
Jeffrey Staboleski
400-430 E. 30th Street,
New York, NY 10016-8310

Application Granted. Defendant is to respond to the Complaint by April 13, 2020. The Initial Pretrial Conference scheduled for March 16 at 3:00PM has been rescheduled to April 13, 2020 at 3:30PM and will proceed by Telephone Conference. Parties are directed to dial in to the Court's teleconference number at 888-251-2909, Access Code 2123101 and follow the necessary prompts.

3/13/2020

SO ORDERED.

A handwritten signature in black ink, appearing to read 'L. Liman', is written over a horizontal line.

LEWIS J. LIMAN
United States District Judge